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April 15, 2020

VIA ELECTRONIC MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

Re: Monthly Progress Report No. 155 – March 2020

Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study

(RI/FS)

CERCLA Docket No. 02-2007-2009

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On March 5, EPA Region 2 (Region 2), CPG, and New Jersey Department of Environmental Protection (NJDEP) held a meeting to discuss comments and clarifications on the Draft Upper 9-Mile Interim Remedy Feasibility Study (IR FS).
- On March 25, Region 2, CPG, and NJDEP held a teleconference discuss recommendations from the Contaminated Sediment Technical Advisory Group (CSTAG) on the Draft Upper 9-Mile IR FS Appendices and on Modeling Metrics.

Correspondence

 On March 2, CPG provided Region 2 with a schedule update for planned Current Conditions 2020 Physical Water Column Monitoring (PWCM) equipment redeployment activities. Ms. D. Salkie LPRSA RI/FS - Progress Report No. 155 – March 2020 April 15, 2020 Page 2 of 4

- On March 5, Region 2 and CPG exchanged emails regarding the Draft Upper 9-Mile IRFS schedule.
- On March 4, Region 2 and CPG exchanged emails regarding participants and discussion topics for the planned March 5 teleconference on the Draft Upper 9-Mile IR FS.
- On March 16, CPG delivered the February Monthly Progress Report to Region 2.
- On March 17, Region 2 provided comments to CPG on Appendix H of the Draft Upper 9-Mile IR FS from Region 2 and NJDEP for discussion during the scheduled March 25 teleconference.
- On March 23, Region 2 requested data recorded by the in-water instruments (moorings and manual casts) used in the 2019 Current Conditions PWCM and Small Volume Chemical Water Column Monitoring (SV CWCM) events from CPG.
- On March 23, Region 2 and CPG exchanged emails regarding Current Conditions surface water sampling schedule changes due to the coronavirus work and travel restrictions.
- On March 23, CPG provided Region 2 an update on the scheduled in-water equipment servicing activities for the Current Conditions PWCM program.
- On March 24, CPG requested to discuss comments on the Draft Upper 9-Mile IR FS with Region 2.
- On March 26, Region 2 provided CPG closing remarks for the March 25 Draft Upper 9-Mile IR FS teleconference and suggested agenda items for the next teleconference.
- On March 27, Region 2 provided CPG additional comments from NJDEP on Appendix D of the Draft Upper 9-Mile IR FS.
- On March 31, Region 2 provided suggested footnote language related to Remedial Acton Outcome (RAOs) to CPG for the Draft Upper 9-Mile IR FS to address CSTAG's recommendation concerning how to address potential actionable areas above RM 15 to the Dundee Dam.

Work

- CPG continued work on supplemental modeling projections for the Draft Upper 9-Mile IR FS.
- CPG continued reviewing and response to Region 2 comments on the Draft Upper 9-Mile IR FS.
- CPG conducted the 2020 in-water equipment deployment of the PWCM component of Current Conditions Sampling.
- CPG completed data validation for 2019 Current Conditions PWCM and SV CWCM sampling programs.
- CPG continued developing the QAPP for the Current Conditions High Volume (HV) CWCM program.
- CPG continued work on revision and calibration of the Bioaccumulation Model.
- CPG continued analysis of 2019 Current Conditions Sampling Biota composite tissue samples.

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(b) Results of Sampling and Tests

- On March 16, CPG uploaded Electronic Data Deliverables (EDDs) of preliminary, unvalidated data from the 2019 Current Conditions Biota Sampling program to the EPA SharePoint site.
- On March 17, CPG uploaded EDDs of validated data from the 2019 Current Conditions SV CWCM event 7 (December) and the addition of chlorophyll results for the SV CWCM event 2 (September) to the EPA SharePoint site.
- On March 23, CPG uploaded requested mooring and manual cast data recorded by the in-water instruments used in the 2019 Current Conditions PWCM and SV CWCM events to the EPA SharePoint site.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue calibration of the Bioaccumulation Model.
- CPG will continue to respond to comments and revise the Draft Upper 9-Mile IR FS.
- CPG will conduct Current Conditions PWCM and CWCM events if river conditions and COVID 19 restrictions permit.
- CPG will continue supplemental modeling projections for the Draft Upper 9-Mile IR FS.
- CPG will continue analysis of the Current Conditions Biota composite tissue samples.
- CPG will initiate validation of Current Conditions Biota tissue data.

(d) <u>Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.</u>

- Contractor Corporate and New Jersey work/travel restrictions associated with COVID-19 could delay 2020 Current Conditions Sampling field work.
- Ongoing discussions between NJDEP and Region 2 regarding the source sediments definition for the IR need to be resolved in order for the CPG to complete IR FS in the time-frame consistent with EPA's goals.

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.

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Willard Potter

CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel

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